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February 8, 2023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Regional Freedom of Information Officer
U.S. EPA, Region 9
5 75 Hawthorne Street (ORC-1)
San Francisco, CA 94105

Re: Freedom of Information Act ("FOIA") Request
Destruction of Material by LOCKHEED

Dear Custodian of Records:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq.*, request is hereby made to obtain copies of the following records maintained by your agency:

DEFINITIONS:

- IDENTIFIED AREAS: Los Angeles County, California.
- IDENTIFIED TIMEFRAME: January 1, 1970 through and including 1994.
- The terms "ADVERSE HEALTH EFFECT(S)/OUTCOME(S)" shall refer to the causation, promotion, facilitation and/or exacerbation of a structural and/or functional abnormality, with the implication that the abnormality produced has the potential of lowering the quality of life, contributing to a disabling illness, or leading to premature death.
- "COMMUNICATION" means any disclosure, transfer, or exchange of information, whether orally, in writing, face-to-face, by telephone, mail, email, text messages, social media, multimedia, telephone, mail, email, direct messenger (including by Slack, Microsoft Teams, or comparable software) or otherwise.

- “DOCUMENT” means any tangible thing, writing, recording, or reproduction in any manner, any visual or auditory data in YOUR possession, custody, or control, including without limitation, electronically stored information, computer data bases, hard drives, storage tapes, or disks, all e-mail data (including attachments thereto), any digital version of any requested information, and any papers or other format on which words have been written, printed, typed, digitally embedded, or otherwise affixed, correspondence, memoranda, transcripts, stenographic, or handwritten notes, telegrams, telexes, facsimiles, letters, reports, budgets, forecasts, presentations, analyses, training, or instructional handbooks or manuals, graphs or charts, ledgers, invoices, diaries, or calendars, minute books, meeting minutes, computer print-outs, prospectuses, financial statements, checks, bank statements, annual, quarterly or other filings with any governmental agency or department, annual reports (including schedules thereto), statistical studies, articles appearing in publications, press releases, video or audio tapes, and shall mean originals or a copy where the original is not in YOUR possession, custody or control, and every copy of every DOCUMENT where such copy is not an identical copy of an original (whether different from the original by reason of any notation made on such copy or for any other reason).
- “HEALTH ISSUES” or “MEDICAL ISSUES” shall refer to any physical or mental occurrence, the threat of such occurrence, and/or impact, harmful and otherwise, that relates, in any way, to a PERSON(S). These terms shall include, but are not limited to, burning sensation, rash, damage to the skin or other organ, respiratory or breathing problems, loss of hair, eye problems, all degrees of stomach ills, lethargy, weakness, abnormal sleep patterns, loss of appetite, loss of weight, difficulty focusing, migraine and headache, depression, disorientation, confusion, suicidal thought, and any other form of mental health issues or indicators.
- “LOCKHEED” shall refer to Lockheed Corporation, Lockheed Aeronautical Systems Company (aka “LASC”), and/or Lockheed-California Company, and/or any d/b/a of LOCKHEED, affiliate, subsidiary, and/or parent company and/or corporation of LOCKHEED. The term shall further refer to any PERSON(S) who is an agent, employee, officer, contractor, advisor, board member, member, shareholder, principal, and/or custodian of LOCKHEED.
- “PERSON” or “PERSONS” includes a natural person, firm, corporation, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity or all predecessors or successors in interest.
- “REGARDING”, “CONCERNING”, “RELATED TO”, and “RELATE TO” shall be construed in their broadest sense and shall include constituting, containing, incorporating, pertaining, summarizing, comprising, defining, involving, analyzing, considering, mentioning, showing, describing or commenting upon, in whole or in part, the subject of request.
- The term “RISK” or “RISKS” shall refer to a situation involving exposure to danger, harm or loss, or the possibility or likelihood of danger, harm, or loss. These terms shall also include danger, harm, or loss related to the environment and environmental sources relied upon by the public.
- “STATEMENT” or “STATEMENTS” means any disclosure, transfer, or exchange or information, whether orally, in writing, face-to-face, by telephone, mail, email, text

messages, social media, multimedia, telephone, mail, email, direct messenger (including by Slack, Microsoft Teams, or comparable software) or otherwise, including but not limited to (1) a written statement signed or otherwise adopted or approved by the PERSON making it, (2) a stenographic, mechanical, electrical, or other recording, or a transcription thereof, which is a substantial verbatim recital, or (3) an oral statement by the PERSON making it and contemporaneously recorded.

- “TEST,” “TESTS,” or “TESTING” shall mean any manner of determining the presence, amount, type, or source or origin of any and all chemicals in the IDENTIFIED AREAS.
- “YOU” and “YOUR” shall refer to the responding agency.
- “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the Request for Production inclusive rather than exclusive.
- Words in the singular include the plural, and vice versa, and the words “and” and “or” include “and/or.” The past tense includes the present tense when the clear meaning is not distorted by the change of tense.

MANNER OF COMPLIANCE: (in order of preference)

- (1) Digital, Data, and/or Soft Copy form.
- (2) If method (1) not available, e-mailed to jperry@actslaw.com in pdf or available form.
- (3) If neither (1) or (2) available, mail hard copy to James G. Perry at 16001 Ventura Blvd., Suite 200, Encino, CA 91436.

FOIA Requests

REQUEST NO. 1:

ALL DOCUMENTS referencing, referring to, or otherwise relating to the destruction, burning, elimination, and/or disposal by LOCKHEED of any thing and/or substance in the IDENTIFIED AREAS during the IDENTIFIED TIME FRAME.

REQUEST NO. 2:

ALL DOCUMENTS referencing, referring to, or relating to any violations of law, regulations, and/or the like by LOCKHEED RELATED TO the IDENTIFIED AREAS from 1980 to the present.

REQUEST NO. 3:

ALL DOCUMENTS referencing, referring to, or otherwise relating to violations of law, regulations, and/or the like that is RELATED TO the destruction, burning, elimination, and/or disposal by LOCKHEED of any thing and/or substance in the IDENTIFIED AREAS during the IDENTIFIED TIME FRAME.

REQUEST NO. 4:

ALL DOCUMENTS referencing, referring to, or otherwise relating to health, hazard, safety, environmental, and/or quality-of-life dangers, risks, issues, and/or concerns RELATED TO the destruction, burning, elimination, and/or disposal by LOCKHEED of any thing and/or substance in the IDENTIFIED AREAS during the IDENTIFIED TIME FRAME.

REQUEST NO. 5:

ALL DOCUMENTS referencing, referring to, or otherwise relating to LOCKHEED's transportation and/or handling of any substance and/or thing to Grand Lake, Nevada for

destruction, burning, elimination, and/or disposal during the IDENTIFIED TIME FRAME.

REQUEST NO. 6:

ALL COMMUNICATIONS referencing, referring to, or otherwise relating to LOCKHEED's transportation and/or handling of any substance and/or thing to Grand Lake, Nevada for destruction, burning, elimination, and/or disposal during the IDENTIFIED TIME FRAME.

REQUEST NO. 7:

ALL COMMUNICATIONS referencing, referring to, or otherwise relating to health, hazard, safety, environmental, and/or quality-of-life dangers, risks, issues, and/or concerns RELATED TO the destruction, burning, elimination, and/or disposal by LOCKHEED of any thing and/or substance in the IDENTIFIED AREAS during the IDENTIFIED TIME FRAME

REQUEST NO. 8:

ALL COMMUNICATIONS referencing, referring to, or otherwise relating to violations of law, regulations, and/or the like that is RELATED TO the destruction, burning, elimination, and/or disposal by LOCKHEED of any thing and/or substance in the IDENTIFIED AREAS during the IDENTIFIED TIME FRAME.

REQUEST NO. 9:

ALL DOCUMENTS referencing, referring to, or otherwise relating to chemicals found in the IDENTIFIED AREAS, during the IDENTIFIED TIMEFRAME, that RELATES TO LOCKHEED.

REQUEST NO. 10:

ALL DOCUMENTS referencing, referring to, or otherwise relating to TESTS during the IDENTIFIED TIMEFRAME in the IDENTIFIED AREAS that RELATE TO LOCKHEED's actions or inactions, in any way.

REQUEST NO. 11:

ALL DOCUMENTS referencing, referring to, or otherwise relating to RISKS of HEALTH ISSUES RELATED TO destruction, burning, elimination, and/or disposal by LOCKHEED of any thing and/or substance in the IDENTIFIED AREAS during the IDENTIFIED TIME FRAME.

REQUEST NO. 12:

ALL DOCUMENTS RELATED TO YOUR inspection of the LOCKHEED Burbank, California facilities.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$1,000. However, I would also respectfully request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the health risks of those who worked in the IDENTIFIED AREAS.

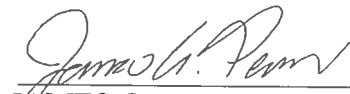
The Freedom of Information Act requires a response within twenty (20) business days. If access to the records will take longer, please contact me with information about when we might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justified the refusal to release information, which specific point or information the refusal pertains to, and notify me of the appeal procedures available to me under the law.

Freedom of Information Act Request
February 8, 2023
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Thank you for considering my requests.

Very truly yours,

A handwritten signature in black ink, appearing to read "James G. Perry", written over a horizontal line.

JAMES G. PERRY

jperry@actslaw.com

Abir Cohen Treyzon Salo, LLP